

AO 106A (08/18) Application for a Warrant by Telephone or Other Reliable Electronic Means

## UNITED STATES DISTRICT COURT

for the  
District of New Hampshire

In the Matter of the Search of

*(Briefly describe the property to be searched  
or identify the person by name and address)*USPS Priority Mail parcel 9505 5137 1921 1019 9530 99  
addressed to Mr Johnson 348 Central St Manchester,  
NH 03103

Case No. 1:21-mj- 22-01-AJ

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:USPS Priority Mail parcel 9505 5137 1921 1019 9530 99 addressed to Mr Johnson 348 Central St Manchester, NH 03103 that is presently in the custody of the U.S. Postal Inspection Service Manchester, NH located in the \_\_\_\_\_ District of \_\_\_\_\_ New Hampshire \_\_\_\_\_, there is now concealed *(identify the person or describe the property to be seized)*:

Controlled substances, United States currency or currency equivalents, ledgers, documents, correspondence that is evidence of drug trafficking.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

| <i>Code Section</i>                 | <i>Offense Description</i>  |
|-------------------------------------|---|
| 21 USC §§ 841(a)(1), 843(b) and 846 | Possession with Intent to Distribute and Distribution of Controlled Substance(s)<br>Use of a Communication Facility in the Commission of a Controlled Substance<br>Trafficking Offense and Conspiracy |

The application is based on these facts:

Please see attached affidavit.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days *(give exact ending date if more than 30 days: \_\_\_\_\_)* is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/s/ Bruce A. Sweet

*Applicant's signature*

Bruce A. Sweet, Postal Inspector

*Printed name and title*Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
\_\_\_\_\_ telephone conference *(specify reliable electronic means).*

Date: 01/25/2021

City and state: Concord, New Hampshire

*Andrea K. Johnstone**Judge's signature*

Andrea K. Johnstone, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT**

I, Bruce A. Sweet, United States Postal Inspector, being duly sworn, depose and state as follows:

**I. INTRODUCTION**

1. I have been employed as a Postal Inspector by the United States Postal Inspection Service ("USPIS") since January 2006. I was assigned to the Prohibited Mail Narcotics Team in Philadelphia, Pennsylvania for approximately two years, and I have been assigned to the Prohibited Mail Narcotics/Miscellaneous Crimes Team in Manchester, New Hampshire since December 2012. On these teams, I have been responsible for conducting investigations involving the transportation of controlled substances or proceeds/payments for controlled substances through the United States Postal Service ("USPS"). I have intercepted hundreds of USPS Priority Mail Express or Priority Mail parcels which were found to have contained controlled substances or the proceeds from the sales of controlled substances through the United States Mail.
2. I have received extensive training in criminal investigations, procedures and criminal law, and I have assisted senior postal inspectors and other law enforcement agents in numerous criminal investigations and in the execution of search warrants. I have received training from the USPIS in the investigation of controlled substances and proceeds/payments for controlled substances being transported through the United States Mail. I have also received asset forfeiture training and have consulted with senior postal inspectors and asset forfeiture specialists.
3. I am a law enforcement officer of the United States within the meaning of Title 18 U.S.C. § 3061, and am empowered by law to conduct investigations and make arrests for offenses enumerated in Title 21 U.S.C. §841(a)(1), distribution of controlled

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substances, Title 21 U.S.C. §843(b), use of a communications facility in the commission of narcotics trafficking offenses, Title 21 U.S.C. §846, conspiracy to possess with intent to distribute and distribution of controlled substances and other federal offenses.

4. The information set forth in this affidavit is based on an investigation other law enforcement agents and I are conducting. This affidavit does not contain every fact known to me with respect to this investigation. Rather, it contains those facts I believe to be necessary to establish probable cause for issuance of this search warrant.

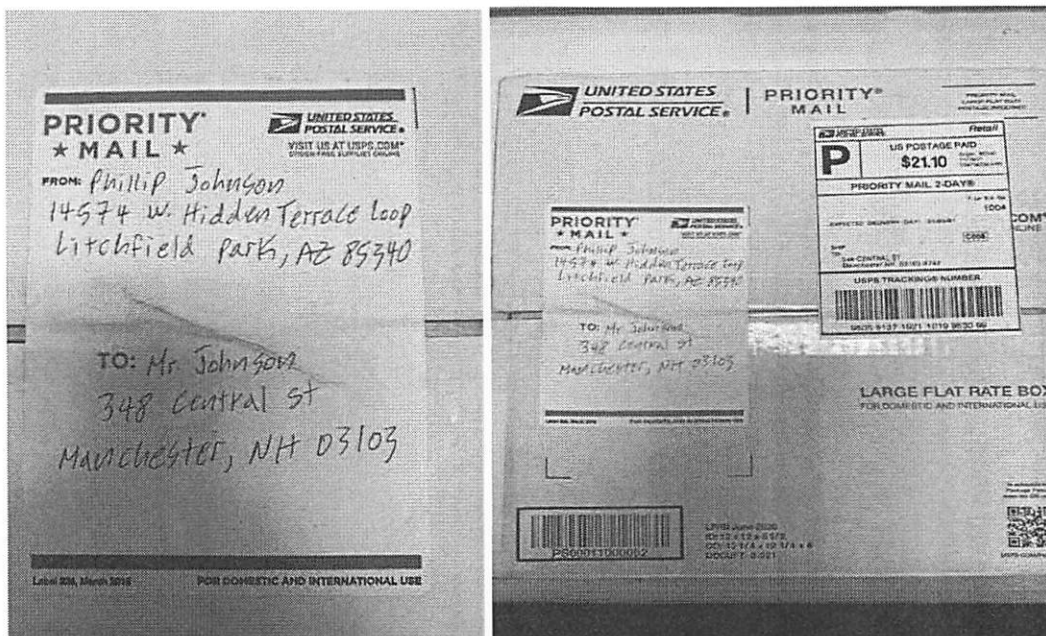
**II. GENERAL BACKGROUND CONCERNING THE SHIPMENT OF DRUGS AND DRUG SALE PROCEEDS THROUGH THE UNITED STATES MAILES**

5. Based on my training and experience, I know that individuals shipping controlled substances via the United States Mail primarily utilize Priority Mail Express and Priority Mail because of the speed, reliability, free telephone and internet package tracking service, as well as the perceived minimal chance of detection. Mailers often use fictitious names and/or fictitious return addresses to prevent them from being identified and apprehended by law enforcement. Additionally, it is not uncommon to use legitimate names and legitimate addresses that are not, at the time the package is shipped, associated with each other. Additionally, in the cases where USPS Priority Mail Express and Priority Mail packages containing controlled substances and/or proceeds of controlled substances have displayed a business or company name or used a business address, it not infrequently proves to be a fictitious business or company, or, in certain cases, a legitimate company whose name or address was being used without the knowledge or authorization of that business.

6. Based on my training and experience, I know that narcotics traffickers often send their illegal narcotics through the mail from source states, such as California, Arizona, Texas, Nevada and the U.S. Territory of Puerto Rico. Also, based on my training and experience, I know individuals who receive narcotics parcels via the U.S. Mail often make return payments for those narcotics through the mail. The return payments are mailed to source states in the form of bulk U.S. currency and money orders, to include U.S. Postal Service money orders.

### III. DESCRIPTION OF THE SUBJECT PARCEL

7. Based on the information contained in this affidavit, there is probable cause to believe, and I do believe, that a Priority Mail parcel displaying a handwritten Priority Mail label, bearing tracking number 9505 5137 1921 1019 9530 99, addressed to “Mr. Johnson 348 Central St Manchester, NH 03103” and bearing a return address of “Phillip Johnson 14574 W. Hidden Terrace Loop Litchfield Park, AZ 85340” (the “Subject Parcel”), contains controlled substances. Images of the Subject Parcel are incorporated herein:



8. The Subject Parcel is a white USPS Priority Mail large flat rate box measuring approximately 12.25" x 12.25" x 6" and weighs approximately 7.438 pounds and bears \$21.10 in postage. The parcel was mailed on January 19, 2021, from Litchfield Park, AZ 85340.

#### **IV. INVESTIGATION TO DATE**

9. On Friday, January 22, 2021, Postal Inspectors in Manchester, NH identified the Subject Parcel as a parcel possibly containing a controlled substance and/or proceeds tied to controlled substance violations, which was destined to New Hampshire. On Friday, January 22, 2021, Postal Inspectors in Manchester, NH were physically able to take custody of the Subject Parcel.
10. A review of database records indicated that the delivery address on the Subject Parcel, "348 Central St Manchester, NH 03103," is an actual address. A check of the law enforcement database CLEAR, which has proven reliable in previous investigations, does not show the last name "Johnson" as being associated with the address. Instead, shown in CLEAR as possible residents of the address are the names "Aida Mongu and Hillana Kodi."
11. A further review of USPS records for 348 Central St. Manchester, NH indicate an individual placed a change of address in September 2020, moving from 348 Central St. Manchester, NH to another address located within the city. There has not been any further change of addresses submitted to the USPS going in to or out of 348 Central St. Manchester, NH within the last year.
12. The return address of the Subject Parcel, "14574 W. Hidden Terrace Loop Litchfield Park, AZ 85340" does appear to be an actual address. Using the law enforcement



database CLEAR, law enforcement queried the name, "Phillip Johnson", listed on the return address, and did not find any results for "Phillip Johnson" at the address.

13. Inspectors further queried the return address using open source databases and determined the return address, "14574 W. Hidden Terrace Loop Litchfield Park, AZ 85340," is currently for sale.
14. Based on my training and experience, I know that individuals who utilize United States Postal Service Priority Mail services to ship controlled substances can use any name for the sender and recipient on the parcel. In an attempt to avoid detection by law enforcement, these individuals sometimes use real return addresses with fictitious last names and also use fictitious names at the destination address. These indicators are present on the Subject Parcel.
15. Also based on my training and experience, I know individuals who utilize United States Postal Service Priority Mail services to ship controlled substances may use addresses recently or currently for sale. Due to the ease of locating an address currently for sale using online resources, drug dealers will use the address in attempt to avoid detection by law enforcement.

**V. CANINE POSITIVE RESPONSE TO PACKAGE**

16. On January 22, 2021, Inspectors contacted Officer Martens of the Manchester, NH Police and requested that he and his drug detection K-9, "Grimm," review the Subject Parcel for the scent of controlled substances. Inspectors arranged to meet Officer Martens at the U.S. Postal Inspection Service's office at the Manchester, NH P&DC. Officer Martens arrived at the P&DC with Grimm in order to review the Subject Parcel. Officer Martens advised Inspectors that Grimm is a Belgian Malinois. Officer Martens informed Inspectors that he uses Grimm in the detection of controlled

substances in different situations, including within sealed packages shipped through the United States Mail and other courier services. Officer Martens further informed Inspectors that he and Grimm successfully completed the United States Police Canine Association certification process and that their certification is current. The certification process involves a comprehensive test designed to measure the ability of the dog and the handler in searching for and indicating the presence of illegal drugs. This certification is administered in different environments with a variety of distractions and is designed to duplicate actual field conditions that may be encountered by the canine team. Officer Martens advised Inspectors Grimm was certified in the detection of odors of cocaine and its derivatives, heroin and its derivatives, and methamphetamines and its derivatives.

17. On January 22, 2021, the Subject Parcel was examined by certified narcotics detection K-9 Grimm. The Subject Parcel was individually placed among four (4) other similar sized parcels. Upon examination of the parcels, Officer Martens advised K-9 Grimm had alerted to the Subject Parcel.
18. Based on my training and experience, I know that in addition to narcotics, packages such as the Subject Parcel often contain other indicia of narcotics trafficking such as bulk currency, money orders, records or "ledgers" relating to the controlled substances and/or records or other documents relating to the identity of the individual(s) who shipped the package(s) or the intended recipient(s) of such packages.
19. The Subject Parcel is presently in the custody of the U.S. Postal Inspection Service located at 955 Goff Falls Rd. Manchester, NH 03103.

## **VI. CONCLUSION**

20. Based on the facts described above, I believe that there is probable cause to believe that the Subject Parcel described above contains controlled substances, cash, money orders, or other documents relevant to drug trafficking in violation of Title 21, United States Code, Sections 841(a)(1) (possession with intent to distribute and distribution of controlled substances), 843(b) (use of a communication facility in the commission of a controlled substances trafficking offense), and 846 (conspiracy to possess with intent to distribute and distribution of controlled substances).
21. Accordingly, I respectfully request that this Court issue a search warrant authorizing the search of the Subject Parcel for Items, documents, records, files, and other information that constitutes evidence, fruits, and/or other instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846, including controlled substances, money, records relating to controlled substances and/or money, and/or records relating to the identity of the individual who shipped the package or the intended recipient of the package.

/S/ Bruce A. Sweet  
BRUCE A. SWEET  
UNITED STATES POSTAL INSPECTOR

The affiant appeared before me by telephonic conference on this date pursuant to Fed. R. Crim. P. 4.1 and affirmed under oath the content of this affidavit and application.

Date: **Jan 25, 2021**  
Time: **9:19 AM, Jan 25, 2021**

*Quane K. Mastone*  
HONORABLE JUDGE JOHNSTONE  
UNITED STATES MAGISTRATE JUDGE

